

REMARKS

Applicant would like to extend his appreciation to the Examiner for the time and attention accorded this case. As will be set forth in detail herebelow, the issues raised by the Office in the outstanding Office Action, when reconsidered in light of the foregoing amendments and the following comments, should be resolved in Applicant's favor.

In response to the rejection of claims 6-9 under 35 U.S.C. 112, ¶2, claim 6 has been amended as set forth above to delete the objectionable "such as" language. Applicant respectfully submits that claims 6-9, as amended, comply with 35 U.S.C. 112, ¶2.

The Examiner rejected claims 1-10 and 16-27 under 35 U.S.C. 102(b) as being anticipated by Butterfield (US 3,818,125). The Applicant respectfully traverses this rejection.

As amended, claim 1 recites a viewing system comprising an arrangement for producing at least one image that is perceived as three dimensional wherein camera interocular separation is substantially less than about 60 mm without being proportionately scaled for human interocular separation. Butterfield (col. 2, ln. 43-63) teaches camera interocular separation less than about 60 mm but only proportionately scaled for human interocular separation. The purpose of changing or reducing interocular separation taught by Butterfield is to achieve consistent

stereoscopic perception when the camera-to-scene distance changes to unusually close or unusually far values. For such purpose it is appropriate to follow the teachings of Butterfield in this regard.

In contrast to Butterfield, the camera interocular separation of "substantially less than about 60 mm" in Applicant's claims, as amended, is without regard to the proportional scale for human interocular separation. The purpose for changing the interocular separation in Applicant's invention including the system of claim 1, as amended, is entirely different from that taught by Butterfield. Contrary to the teachings of Butterfield, the camera interocular separation in Applicant's invention for any camera-to-scene distance is reduced to a value which is "substantially less than about 60 mm" but is nonetheless large enough to stimulate the viewer's stereoscopic perception. In the instant application, Applicant uses the term "microstereopsis" to refer to the effect that results from such reduction in the camera interocular separation for any camera-to-scene distance which is large enough to produce a three-dimensional image, while also minimizing the psychophysical stress on the viewer.

Butterfield does not anticipate claim 1 under 35 U.S.C. 102(b) because it does not teach "microstereopsis", i.e., the camera interocular separation for any camera-to-scene distance of "substantially less than about 60 mm" without regard to the

proportional scale for human interocular separation, as recited in claim 1. As a result, it is respectfully submitted that claim 1 is fully distinguished over Butterfield and in condition for allowance. Moreover, by virtue of dependence from claim 1, it is respectfully submitted that claims 2-5 are allowable as well. The Examiner will note that claim 4 has also been amended to remove the limitation that the camera interocular separation is proportionately scaled for human interocular separation.

For the same reasons, Butterfield does not anticipate claims 7-9 (as amended) and 17-27 under 35 U.S.C. 102(b) since such claims require "microstereopsis" as defined by the Applicant.

Butterfield does not anticipate any of claims 6 (as amended), 7-9 (as amended), 10, 19, or 24 wherein the crosstalk in the stereo display is required to be perceived as foreground and background blurring and not ghosting. The Examiner's citations to Butterfield (col. 2, ln. 28-37 and col. 13, ln. 34-38) do not teach the requirement of perceiving the crosstalk as blurring instead of ghosting. The cited passages of Butterfield indicate that blurring is undesirable since it requires refocusing. To the contrary in Applicant's invention, viewing crosstalk as blurring, instead of ghosting, is highly desirable since blurring of the foreground and background images is not objectionable to the viewer whereas ghosting is highly objectionable.

On page 3 of the Office Action, the Examiner cites to Butterfield's proportional changing of the stereo base as teaching the "means for compensating the center-of-interest as to reduce convergence-accommodation conflict" recited in claims 5, 18 and 23. Applicant respectfully responds that such proportional changing of the stereo base of Butterfield is not such a "means for compensating" as disclosed in the application, which specifically discloses optical or algorithmic "means for compensating" or a combination thereof. (See, Application, page 3, ln. 12-19). Thus, claims 5, 18 and 23 are distinguished over Butterfield for this additional reason.

The Examiner rejected claims 11-15 under 35 U.S.C. 103(a) as being unpatentable over Butterfield. The Applicant respectfully traverses this rejection. Each of claims 11-15 depends directly from claim 10. As set forth above, claim 10 is distinguished over Butterfield in that claim 10 requires crosstalk in the stereo display to be perceived as foreground and background blurring and not ghosting. Because Butterfield does not teach or suggest this limitation of claim 10, it cannot render obvious claims 11-15 which depend from claim 10. Furthermore, the Examiner has failed to cite to a suggestion in the art to combine the specific types of displays recited in claims 11-15 with Butterfield in rejecting claims 11-15 as being obvious. As stated immediately above, even if the Examiner had cited to such a suggestion, Butterfield still would not render obvious claims 11-15 under 35 U.S.C. 103(a) due to the

deficiencies in the teachings thereof with respect to viewing crosstalk as blurring and not ghosting.

In view of the foregoing, it is respectfully submitted that the present rejections have been overcome. Reconsideration and withdrawal thereof are hereby respectfully requested. Applicant respectfully submits that the instant application is presently in condition for allowance. Notice to the effect is hereby earnestly solicited.

Respectfully submitted,

A handwritten signature in dark ink, reading "Paul D. Bangor, Jr." with a stylized flourish at the end.

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